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SABRINA P. SHROFF

ATTORNEY AT LAW

MEMORANDUM ENDORSED

November 11, 2023

Hon. Gregory H. Woods Judge, United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Tyquan Goodlet, 22 Cr. 497 (GHW)

Dear Judge Woods,

I write to request the Court authorize Pretrial Services to approve or disapprove weekly gym visits and weekly dates and times when Mr. Goodlet can take his son out of the house. Should the Court grant the modification, Pretrial would in their discretion determine if the requests are reasonable and monitor compliance with the permission granted to Mr. Goodlet.

I am told by Pretrial that although they know that going to the gym would be good for Mr. Goodlet's physical and mental health, they object per policy. In addition, per policy they object to Mr. Goodlet taking his son for a daily walk. Pretrial further notes Mr. Goodlet's increased compliance with his conditions of release. Pretrial also notes that Mr. Goodlet has increased the number of times he meets with his treatment provider but has tested positive for marijuana use.

Pretrial notes that should the Court grant Mr. Goodlet's request, Mr. Goodlet would provide the dates for gym visits to pretrial, pretrial would approve specific dates and keep a log of the dates he is allowed to go to the gym. The same procedure would be used for the times he takes his son out of the home to the park or for a walk.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

Sabrina Shroff Counsel to Tyquan Goodlet

Application granted in part. Pretrial Services is authorized to approve or disapprove weekly gym visits and weekly walks with Mr. Goodlet's son, provided that, with respect to the approval of any such visit or walk, to the knowledge of Pretrial Services Mr. Goodlet is in full compliance with all other conditions of his pretrial release at the time of the approval. Pretrial Services may establish time and location limitations for any such outings in its discretion and may in its discretion modify the location monitoring system used for Mr. Goodlet, including the use of GPS location monitoring. All other conditions of Mr. Goodlet's pretrial release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 126.

SO ORDERED.

Dated: November 12, 2023 New York, New York

rk United States District Judge

80 Broadway, 19th Floor New York, New York 10004 Telephone: (646) 763-1490

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #:

DATE FILED: 11/12/2023